

PSJ3
Exhibit 489

From: Gray, John
Sent: Friday, January 10, 2014 7:54 PM
To: Kelly, Patrick
Subject: Re: DEA notes

Speaking of Carmen, I congratulated him on the pedigree bill last night and he said he was opposed to it AND the compounding bill! I thought NABP was on board at the end. He did not elaborate on his opposition. I will ask him tonight!

Sent from my iPhone

On Jan 10, 2014, at 3:32 PM, "Kelly, Patrick" <pkelly@hdmanet.org> wrote:

By all means.

From: Gray, John
Sent: Friday, January 10, 2014 2:15 PM
To: Kelly, Patrick
Subject: Re: DEA notes
Can I share with Dave Neu?

Sent from my iPhone

On Jan 10, 2014, at 12:00 PM, "Kelly, Patrick" <pkelly@hdmanet.org> wrote:

Done. Copied you.

On an aside. Had a conversation with the head of State Government Affairs for Purdue Pharma yesterday. He told me that NABP, under the direct leadership of Carmen Catizone, has convened a stakeholder group to develop what they are referring to as a "Red Flags" guidance document. The plan is to work with prescribers and dispensers to address the recent friction between Docs and Pharmacists about questioning the legitimacy of scripts for pain meds.

Participating groups were:

From the Docs - American Medical Association, American Osteopathic Association, American Academy of Family Physicians

From Pharmacy – NACDS, NCPA, APHA, CVS, Walgreen

Other Groups - PhRMA (Purdue Pharma representing), PCMA, and Cardinal Health (specifically Bob Giacalone)

AND --- our friends from DEA: Joe Rannazzisi, Al Santos, John Partridge, Robert Hill and Imelda Paredes – Essentially the entire senior management team at the DEA Office of Diversion Control.

NABP is the umbrella group bringing everyone to the table.

From what I understand, NABP plans to issue some type of a statement/issue brief in early February defining the issue and announcing that they are working with the stakeholder community to develop recommendations to address drug abuse and diversion, doctor shopping, bogus scripts, pill mills, et al. They plan to have a document of recommendations to address these issues finalized by the end of March.

The thinking behind this is to have NABP issue a guidance for Docs and Pharmacists to adhere to that would help address the problem. The subtext strategy is that DEA

continues to be totally disengaged with regard to issuing any type of guidance. In lieu of direct guidance from DEA, NABP will take the mantle and issue a non-binding guidance that docs and pharmacists can use. The hope is that this guidance will create some degree of process that will 1.) hopefully keep DEA at bay, and 2.) failing that, provide something to bring to court in the event of a DEA action. The hope being that registrants can at least say they were adhering to some type of specific process rather than blindly guessing at what DEA expects registrants to know and do.

Sorry for the ramble. If Carmen is there, maybe you can ask him to fill you in. We have not been asked to participate, nor have MCK or ABC. From what I understand Bob Giacalone and Carmen are old buddies, which may explain why he was asked to participate.

PK

-----Original Message-----

From: Gray, John

Sent: Friday, January 10, 2014 9:35 AM

To: Kelly, Patrick

Subject: DEA notes

Patrick : can you please email your Dec notes of the strategy task force to Dave Neu today. He wants to forward to Steve Collis for in internal meeting today at ABC. I will call you later. Dave says it is really getting bad out there with DEA and State Ags working together on criminal enforcement actions. He cannot share details though. It is pervasive across the industry.

Sent from my iPhone